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ATTORNEY FOR DEFENDANT
Shalom Ifrah

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO. 2:22-CR-0046-TLN
)	
Plaintiffs,)	STIPULATION TO ALLOW
)	DEFENDANT IFRAH' TO TRAVEL
)	TO AND FROM NEW YORK;
vs.)	DECLARATION OF DAVID E.
)	KENNER; ATTACHMENTS A AND B
)	
SHALOM, IFRAH ET AL.,)	[PROPOSED] ORDER LODGED
)	HEREWITH
)	_____
Defendants.)	

IT IS HEREBY STIPULATED by and between Phillip Talbert, United States Attorney, through Roger Yang, Assistant United States Attorney, attorney for Plaintiff, and David E. Kenner, attorney for defendant Shalom Ifrah, with the concurrence of the Pretrial Services Agency, that the defendant may travel to and from Brooklyn, New York, on November 18, 2022 and returning on November 21, 2022.

This request is supplemented by the declaration of undersigned counsel, Exhibits A and B and all the files and records in this case.

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STIPULATION TO ALLOW DEFENDANT IFRAH' TO TRAVEL TO AND FROM NEW YORK;
DECLARATION OF DAVID E. KENNER; ATTACHMENTS A AND B

IT IS SO STIPULATED.

Respectfully submitted,

Dated: November 17, 2022

/s/

DAVID E. KENNER
Attorney for Defendant
SHALOM IFRAH


Dated: November 17, 2022

/s/

ROGER YANG
Assistant United States Attorney
Counsel for Plaintiff

IT IS SO ORDERED.

Dated: November 17, 2022



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

e

DECLARATION OF DAVID E. KENNER

David E. Kenner declares:

1. I am the attorney of record for the herein defendant, Shalom Ifrah.
2. Attached as Exhibit A is a true and correct copy of a receipt showing that, on November 16, 2022, Mr. Ifrah purchased a round trip ticket for his trip to New York (LAX round trip to and from New York)
3. Attached as Exhibit B is a true and correct copy of his temporary residence at an AirBNB while traveling located at: 1174 Eastern Parkway 3, Brooklyn, NY 11213.
4. The reason for Mr. Ifrah' trip is a Jewish Chabad event.
5. I have met and conferred with: (a) Mr. Ifrah' pretrial services officer, Deputy Zepeda, who has indicated that I can represent to the Court that, she has no objection to this request. Also, AUSA Roger Yang has no objection to the court granting this request. Further, they do not oppose Mr. Ifrah' traveling without the location monitoring equipment.

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1 I declare under penalty of perjury, according to the laws of the United States of
2 America, that the foregoing is true and correct this 17th day of November, 2022, at
3 Encino, California.

4 _____/s/_____
5 David E. Kenner
6 Attorney at Law
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EXHIBIT A

From: [Shlomi Ifrah](#)
To: [David Kenner](#)
Subject: Fwd: Your Flight Receipt - SHALOM SHLOMO IFRAH 17NOV22
Date: Wednesday, November 16, 2022 5:53:51 PM

Here is the flight information

Sent from my iPhone

Begin forwarded message:

From: Delta Air Lines <DeltaAirLines@t.delta.com>
Date: November 16, 2022 at 17:52:54 PST
To: shlomi_ifrah@hotmail.co.il
Subject: **Your Flight Receipt - SHALOM SHLOMO IFRAH 17NOV22**
Reply-To: Transactional Email Reply Inbox <reply-264062-14_HTML-63915020-10982494-206509@t.delta.com>

[View as a Web Page](#)



[Join SkyMiles](#)

CONFIRMATION #: GU6DVH

Thank you for choosing Delta

You're all set. If your plans change, be sure to make changes or cancel via [MyTrips](#) on [delta.com](#) before your flight departs.

Have a great trip, and thank you for choosing Delta.

Passenger Info

Name: SHALOM SHLOMO IFRAH

FLIGHT	SEAT
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DELTA 554	28D
DELTA 1045	35F

Visit delta.com or download the [Fly Delta app](#) to view, select or change your seat. If you purchased a Delta Comfort+™ seat or a Trip Extra, please visit [My Trips](#) to access a receipt of your purchase.

Thu, 17NOV	DEPART	ARRIVE
DELTA 554 Main Cabin (B)	LOS ANGELES, CA 11:59pm	NYC-KENNEDY 8:22am **Fri 18NOV

Mon, 21NOV	DEPART	ARRIVE
DELTA 1045 Main Cabin (K)	NYC-KENNEDY 8:35am	LOS ANGELES, CA 11:55am

**Arrival date is different than departure date.

MANAGE MY TRIP



Check for Your Destination's Entry Requirements

Many countries have issued travel requirements that may affect your travel plans. We strongly encourage you to review the [Delta Discover Map](#) for the latest on your destination's COVID-19 testing, vaccination and quarantine requirements. If this changes your plans, you may check your eligibility to [change or cancel your flight here](#).

**Updated Nov 7, 2022*



REAL ID-Compliant Licenses or IDs Required as of May 3, 2023

Every air traveler 18 years of age and older will need a REAL ID-compliant driver's license or another acceptable form of ID. Please visit the TSA REAL ID website [here](#) for more information.

Flight Receipt

Ticket #: 0062349772940

Place of Issue:

Issue Date: 16NOV22

Expiration Date: 31DEC23

METHOD OF PAYMENT	
V *****9726	\$1352.20 USD

CHARGES	
Air Transportation Charges	
Base Fare	\$1230.70 USD
Taxes, Fees and Charges	
United States - September 11th Security Fee(Passenger Civil Aviation Security Service Fee) (AY)	\$11.20 USD
United States - Transportation Tax (US)	\$92.30 USD
United States - Passenger Facility Charge (XF)	\$9.00 USD
United States - Flight Segment Tax (ZP)	\$9.00 USD
TICKET AMOUNT	\$1352.20 USD

Checked Bag Allowance

The fees below are based on your original ticket purchase. **If you qualify for free or discounted checked baggage**, this will be taken into account when you check in. Visit delta.com for details on baggage embargoes that may apply to your itinerary.

Thu 17 Nov 2022		LAX-JFK
CARRY ON	FIRST	SECOND
FREE	\$30.00USD (50LBS/23KG)	\$40.00USD (50LBS/23KG)

Visit delta.com for details on [baggage embargoes](#) that may apply to your itinerary.

Mon 21 Nov 2022		JFK-LAX
CARRY ON	FIRST	SECOND
FREE	\$30.00USD (50LBS/23KG)	\$40.00USD (50LBS/23KG)

Visit delta.com for details on [baggage embargoes](#) that may apply to your itinerary.

Your Pre-Trip Checklist for Easier Travel

Baggage tag icon



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Start earning

Hotel icon



**Book Hotel And
Transportation**

Icons



**Visit Our
Help Center**

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EXHIBIT B

David Kenner

From: Shlomi Ifrah <ucolorcenturycityinc@gmail.com>
Sent: Wednesday, November 16, 2022 5:23 PM
To: David Kenner
Subject: Shalom ifrah Reservation confirmed for Brooklyn

Hey David I here is the booking reservations for apartment I will stay in . It's close to 770 eastern parkway- Chabad world center
I will book tickets now and forward as well
Sent from my iPhone

Begin forwarded message:

From: Airbnb <automated@airbnb.com>
Date: November 16, 2022 at 16:56:08 PST
To: ucourcenturycityinc@gmail.com
Subject: Reservation confirmed for Brooklyn



Your reservation is confirmed

You're going to Brooklyn!



Sunny Private Rooftop Getaway-2 Min To Subway.

Entire home/apt hosted by Ryan



Check in

Thursday, November 17, 2022

Check-in is 4:00 PM - 6:00 PM

Check out

Monday, November 21, 2022

Checkout by 11:00 AM

[View full itinerary](#)

Address

1174 Eastern Parkway 3, Brooklyn, NY 11213,
United States

[Get directions](#)

Guests

3

[Invite guests](#)

Cancellation policy

This reservation is non-refundable.

Cutoff times are based on the listing's local time

[More details](#)

Your booking is protected by

aircover

[Learn more](#)

Payments

Payment 1 of 1

PayPal	\$1,480.11
Nov 16, 2022 · 04:55PM PST	

Amount paid (USD)	\$1,480.11
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Balance due (USD)	\$0.00
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Reservation code

HMKNT8EZ4C

Change reservation

House rules

4 guests maximum

Pets allowed

Self check-in with lockbox

Show more

Safety & property

Carbon monoxide alarm

Smoke alarm

Must climb stairs

Show more

Ryan is your host

Contact Ryan to coordinate arrival time and key exchange.

Message host+1 (516) 471-1085

Customer support

Contact our support team 24/7 from anywhere in the world.

Visit help center**Contact Airbnb**



Check for local travel advisories

Many places around the world are issuing new restrictions on lodging and travel each day. Before you travel, please check the latest from the local government in order to keep everyone safe and healthy.

Learn more



Check for local travel advisories

Many places around the world are issuing new restrictions on lodging and travel each day. Before you travel, please check the latest from the local government in order to keep everyone safe and healthy.

Learn more



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San Francisco, CA 94103, USA